

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

INGA DOW, §
§
Plaintiff, §
§
v. § CIVIL ACTION NO. 4:21-cv-01209-P
§
KELLER WILLIAMS REALTY, INC., §
JOHN DAVIS, GO MANAGEMENT, LLC, §
DAVID OSBORN, SMOKEY GARRETT, §
AND GARY KELLER, §
§
Defendants. §

**DEFENDANTS KELLER WILLIAMS REALTY, INC. AND GARY KELLER'S
RESPONSE AMENDING CERTIFICATE OF CONFERENCE ON PLAINTIFF'S
PARTIALLY UNOPPOSED MOTION FOR LEAVE TO FILE PLAINTIFF'S FIRST
AMENDED COMPLAINT**

Defendants Keller Williams Realty, Inc. and Gary Keller (collectively "Defendants") file this response in accordance with the Court's Order [Dkt. 55] to file a response to Plaintiff's Partially Unopposed Motion for Leave to File her First Amended Complaint [Dkt. 53].

After reviewing Plaintiff's motion and proposed amendment, and although Defendants believe the amendment to be futile, Defendants will not oppose the motion considering the non-opposition of codefendants. Defendants will address the remaining and additional deficiencies in the pleadings as needed.¹ Defendants are not opposed to the relief sought in the Motion [Dkt. 53].

¹ Of note, the amendment includes a breach of contract claim invoking the agreements that include the arbitration provisions at issue in Defendants pending motion to compel arbitration.

Respectfully submitted,

By: /s/ Kristin L. Bauer

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AND GARY KELLER**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served on all counsel of record in accordance with the Federal Rules of Civil Procedure on March 28, 2022.

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